FREEMAN, NOOTER & GINSBERG _____ ATTORNEYS AT LAW _____

LOUIS M. FREEMAN THOMAS H. NOOTER* LEE A. GINSBERG 75 MAIDEN LANE SUITE 503 NEW YORK, N.Y. 10038

*NY AND CALIF. BARS

MEMO ENDORSED

October 4, 2(

The Application is granted.

Honorable Paul G. Gardephe United States District Judge Southern District of New York Thurgood Marshal Courthouse 40 Foley Square New York, NY 10007

SO ORDERED:

Dated: October 7, 2021

RE: United States v. Tonya Thomas (Rose, et al), 19 Cr. 789 (PGG)

Your Honor:

I am writing to request a one-time modification of my client's bail conditions.

My client is currently released on a PRB with two co-signers, and her travel limits include the Southern and Eastern District of New York

My application is that the Court grant permission for her to travel to Washington, DC, on Friday Oct 8, 2021 to Sunday Oct 10, 2021, staying at the Washington Hilton Hotel at 1919 Connecticut Ave., NW, in Washington, DC. She will be attending an Autumn wine and music festival at 13601Glissans Mill Road in Mouth Airy, Maryland.

She would also like permission to make a second trip the following weekend, to travel to New Jersey on October 16th to 17th, staying at Bally's Hotel located at 1900 Pacific Avenue Atlantic City, NJ.

I have consulted with AUSA Mathew Andrews and my client's Pre-Trial Officer, Laura Gail, [(646) 864-6852], and neither has any objection to the request.

I thank the Court in advance for Your Honor's consideration of this application.

Sincerely,

/s/ Thomas H. Nooter
Attorney (co-counsel) for Defendant

cc: AUSA Mathew Andrews, by ECF U.S. Pretrial Services Officer Laura Gail, by email